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1905-1992

June 19, 2000

VIA HAND DELIVERY


Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37201

In Re: *Joint Petition of Crockett Telephone, Inc., People's Telephone Company,  
West Tennessee Telephone Company, Inc. and the Consumer Advocate  
Division of the Office of the Attorney General for the Approval and  
Implementation of Earnings Review Settlement  
Docket No. 99-00995*

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Reply of AT&T Communications of the South Central States, Inc. as to Comments of the TEC Companies and the Consumer Advocate Division in the above-referenced case. Copies are being served on counsel for parties of record.

Yours very truly,

  
Val Sanford

VS/ghc

Enclosures

cc: Vance L. Broemel  
T. G. Pappas and R. Dale Grimes  
James P. Lamoureux  
Garry Sharp

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BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

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IN RE: *Joint Petition of Crockett Telephone, Inc., People's Telephone Company, West Tennessee Telephone Company, Inc. and the Consumer Advocate Division of the Office of the Attorney General for the Approval and Implementation of Earnings Review Settlement*

OFFICE OF  
EXECUTIVE SE

Docket No. 99-00995

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REPLY OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES,  
INC. TO COMMENTS OF TEC COMPANIES AND THE  
CONSUMER ADVOCATE DIVISION

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The comments of the TEC Companies and of the CAD with respect to AT&T's list of issues are not directed to framing issues in this case, rather they are directed toward attempting to exclude AT&T from this case. Thus, both comments focus on the merits of the issue as to whether certain AT&T's issues should be transferred to the Universal Service and Access Reform Dockets. To be sure, as AT&T has indicated, that is a proper issue in this matter; but it should be treated as an issue and not be decided on the merits in framing the issues in this case as the TEC Companies and the CAD seek to have done.

AT&T filed a Petition for Leave to Intervene in this case. Intervention by AT&T was allowed by order entered March 29, 2000. Nothing in that order limits the scope of AT&T's participation in this case.


In order for the TRA to approve the proposed Settlement Agreement, the TRA must, first, recognize some set of standards or criteria as governing its determinations. Then, the TRA must apply those standards or criteria to the proposed Settlement

carrying out that approval process. Those issues have to be decided one way or the other by the TRA in making its decision with respect to the proposed Settlement Agreement. Indeed, as pointed out by AT&T in its comments, AT&T's issues simply specify the specific issues necessary to be decided under the TEC Companies' more general statement of issues.

Deciding on a list of issues is not the place for a decision on the merits as to any issue. It may well be that some issues should be decided before other issues; but that is a matter of scheduling, not of listing all issues to be decided. For example, AT&T has no objection to scheduling the disposition of the CAD's issues 2, 3 and 4 as a preliminary matter. As AT&T has stated, there is no merit in the CAD's issues and the sooner they are disposed of the better.

In any event, this case should not be further delayed.

Respectfully submitted,


  
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Attorneys for AT&T Communications of the  
South Central States, Inc.

**CERTIFICATE OF SERVICE**

I, Val Sanford, hereby certify that I have on this 17<sup>th</sup> day of June, 2000 served via Hand-Delivery, the foregoing Reply of AT&T Communications of the South Central States, Inc. to Comments of the TEC Companies and the Consumer Advocate Division on T. G. Pappas and R. Dale Grimes, Esq. Bass, Berry & Sims, 315 Deaderick Street, Suite 2700, Nashville, TN 37238-2700 and Vance Broemel, Esq., Consumer Advocate Division, 425 5<sup>th</sup> Avenue, North, Nashville, Tennessee 37243.

  
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Val Sanford